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10	LIMITED STATES DIS	STRICT COURT
11	UNITED STATES DISTRICT COURT	
12	DISTRICT OF	NEVADA
13	DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC, a Delaware limited	CASE NO.: 2:
14	liability company,	CTIDIII ATION
15	Plaintiff,	STIPULATION EXTEND TIME
16	VS.	PLAINTIFF'S DEFENDANT
17	REED HEIN & ASSOCIATES, LLC d/b/a/ TIMESHARE EXIT TEAM, a Washington limited liability company; BRANDON REED,	DISMISS PUR STAT. §41.660
18	an individual and citizen of the State of Washington; TREVOR HEIN, an individual	(First Stipulat
19	and citizen of Canada; THOMAS PARENTEAU, an individual and citizen of the	(i ii st Stipulat
20	State of Washington; HAPPY HOUR MEDIA	
21	GROUP, LLC, a Washington limited liability	

ASSOCIATES, an individual and citizen of

Washington professional services corporation; and KEN B. PRIVETT, ESQ., a

Defendants.

the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a

citizen of the State of Oklahoma,

CASE NO.: 2:17-cv-03007-APG-VCF

STIPULATION AND ORDER TO EXTEND TIME TO FILE REPLY TO PLAINTIFF'S RESPONSE TO **DEFENDANT SGB'S MOTION TO DISMISS PURSUANT TO NEV. REV.** STAT. §41.660 [ECF NO. 244]

(First Stipulation)

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STIPULATION AND ORDER TO EXTEND TIME TO FILE REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT SGB'S MOTION TO DISMISS PURSUANT TO NEV. REV. STAT. § 41.660 [ECF NO. 244] (First Stipulation)

Pursuant to Local Rule 7-1, Plaintiff DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC ("Plaintiff") and Defendant SCHROETER, GOLDMARK & BENDER, P.S. ("Defendant"), by and through their respective counsel, agree and stipulate as follows:

- 1. On May 1, 2020, Defendant filed Motion to Dismiss Pursuant to NRS 41.660 [ECF No. 204] ("SGB's Motion").
- 2. On May 13, 2020, a Stipulation and Order to Extend Deadline to Respond to SGB's Motion to Dismiss [ECF 227] was entered in this matter, giving Plaintiff until May 29, 2020 to respond to SGB's Motion.
- 3. On May 28, 2020, a second Stipulation and Order to Extend Deadline to Respond to SGB's Motion to Dismiss [ECF 238] was entered in this matter, giving Plaintiff an extension one (1) week, until June 5, 2020 to respond to SGB's Motion.
- 4. On June 3, 2020, a third Stipulation and Order to Extend Deadline to Respond to SGB's Motion to Dismiss [ECF 242] was entered in this matter, giving Plaintiff an extension until June 19, 2020 to respond to SGB's Motion.
- 5. On June 19, 2020, Plaintiff filed its Response to SGB's Motion [ECF No. 244].
- 6. The current deadline for Defendant to file Reply to Plaintiff's Opposition is June 26, 2020.
- 7. The parties have agreed that Defendant may have an extension to time to file its Reply to Plaintiff's Opposition to Defendant SGB'S Motion, making the deadline **Friday, July 24, 2020**.

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Lipson Neilson P.C.

- 8. Pursuant to Local Rule 6-1(b), the Parties state the reason for the extension is that counsel requires more time to evaluate and respond to the Plaintiff's Response to Defendant SGB'S Motion. Counsel for Defendant will also be unavailable for personal reasons the first week of July 2020
- 9. The Parties have entered into this agreement in good faith and not for purposes of delay. This is the first stipulation for extension of time to file Defendant's Reply. This request will not cause any prejudice to the parties in this matter.

Dated this 23rd day of June, 2020.

Dated this 23rd day of June, 2020.

GREENSPOON MARDER LLP

LIPSON NEILSON P.C.

/s/ Phillip A. Silvestri

/s/ Megan H. Hummel

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Attorneys for Defendant Schroeter Goldmark & Bender, P.S.

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

Dated: June 24, 2020.

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